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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

GREG JACOBI, derivatively on behalf of nominal
defendant ECHOSTAR CORPORATION,

CASE NO. 2:12-CV-02075 -JAD-GWF

Plaintiff,

v.

CHARLES W. ERGEN, MICHAEL T. DUGAN,
R. STANTON DODGE, ANTHONY M.
FREDERICO, PRADMAN P. KAUL, TOM A.
ORTOLF, C. MICHAEL SCHROEDER, JOSEPH
P. CLAYTON and DAVID K. MOSKOWITZ,

Defendants,

and

ECHOSTAR CORPORATION,

Nominal Defendant.

STIPULATION AND
ORDER TO EXTEND RESPONSE
DEADLINES TO DEFENDANTS'
MOTION TO DISMISS THE
AMENDED VERIFIED SHAREHOLDER
DERIVATIVE COMPLAINT
(First Request)

Pursuant to Local Rules 6-1 and 7-1, Plaintiff Greg Jacobi (“Plaintiff”), by and through his counsel of record, and Defendants Echostar Corporation, Charles W. Ergen, Michael T. Dugan, R. Stanton Dodge, Tom A. Ortolf, C. Michael Schroeder, Joseph P. Clayton and David K. Moskowitz (collectively “Defendants”), by and through their counsel of record, hereby stipulate and agree, subject to the Court’s approval, that the time for Plaintiff to file a Response to Defendants’ Motion to Dismiss

1 the Amended Verified Shareholder Derivative Complaint ("Motion to Dismiss") shall be extended as
2 set forth below, and in support thereof state as follows:

- 3 1. Defendants filed a Motion to Dismiss (Doc. No. 50) on May 7, 2015;
- 4 2. Plaintiff's Response to Defendants' Motion to Dismiss is currently due on May 26, 2015;
- 5 3. The parties agree that Plaintiff shall have until May 29, 2015 to file his Response to
6 Defendants' Motion to Dismiss;
- 7 4. The parties agree that Defendants shall have until June 12, 2015 to file their Reply to
8 Defendants' Motion to Dismiss;
- 9 5. This stipulation is made in good faith and is not sought for delay or any improper
10 purpose; and
- 11 6. This is the parties' first request for an extension of time.

12 WHEREFORE, the parties hereby stipulate and respectfully request that the Court enter an Order
13 extending the time for Plaintiff to file his Response to Defendants' Motion to Dismiss to May 29, 2015
14 and extending the time for Defendants to file their Reply to Defendants' Motion to Dismiss to June 12,
15 2015.

16 Dated this 26th day of May, 2015.

17 **ALDRICH LAW FIRM, LTD.**

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19 /s/ John P. Aldrich
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ORDER

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IT IS SO ORDERED.

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Dated: May 26, 2015.

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UNITED STATES DISTRICT JUDGE

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